

**DOTAN Y. MELECH**  
Federal Bankruptcy Trustee  
9030 W. Sahara Suite 467  
Las Vegas, NV 89117  
(702) 586-7413 Fax (871) 225-7173  
dym@unitedtrustee.com

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In Re:

SIX STAR CLEANING AND  
CARPET SERVICES, INC

Debtor(s)

Chapter 7  
Case No. 13-18735-MKN

**MOTION TO DISMISS PURSUANT TO  
BANKRUPTCY CODE § 707(A)**

Date: February 19, 2015  
Time: 11:00 a.m.  
Place: Foley Federal Bldg., 3<sup>rd</sup> Floor

DOTAN Y. MELECH, the duly appointed, qualified Federal Bankruptcy Trustee herein,  
files this Motion to Dismiss Bankruptcy Case pursuant to 11 U.S.C. § 707(a).

**STATEMENT OF FACTS:**

1. The Debtor filed for bankruptcy relief under Chapter 11 on October 14, 2013 as Docket No. 1 and Randal R. Leonard is listed as Debtor's Counsel on the Voluntary Petition filed.
2. A Motion to Withdraw of Attorney of Record was filed by Randal R. Leonard on May 8, 2014 as Docket No. 62 and an Order Granting Motion to Withdraw as Attorney of Record was filed on August 13, 2014 as Docket No. 104.
3. An Application to Employ Dan M. Winder, Esq. as Special Counsel was filed on February 21, 2014 as Docket No. 45 and the Order Granting Application to Employ was entered on May 21, 2014 as Docket No. 69.

1 4. The Order Granting Motion to Covert Case from Chapter 11 to Chapter 7 was  
2 entered on September 4, 2014 as Docket No. 118 and Trustee Dotan Y. Melech was  
3 appointed.

4 5. At the time of conversion, the Debtor was not represented by an attorney.

5 6. The initial Chapter 7 341(a) Meeting of Creditors was set for October 16, 2014  
6 as Docket No. 120 and subsequently continued to November 17, 2014, December 1, 2014,  
7 December 15, 2014, and January 12, 2015.

8 7. The Debtor Representative, Rosemary Phillips, has appeared at the 341(a)  
9 Meeting of Creditors, indicated that the entity was not represented by counsel, and that she  
10 was attempting to find new counsel for the entity.

11 8. The Trustee granted the continued 341(a) Meeting of Creditors in the hopes that  
12 the Debtor Representative, Rosemary Phillips, would be able to obtain counsel for the  
13 Debtor.

14 9. To the Trustee's knowledge, no new counsel has been hired to represent the  
15 Debtor for this proceeding.

16 10. Pursuant to 11 U.S.C. § 707(a), the bankruptcy court may dismiss a case for  
17 cause. Cause exists to dismiss the Debtor's bankruptcy case because:

18 a. Debtors's bankruptcy petition was improperly filed *pro se* on September  
19 4, 2014. The Nevada courts require corporations to be represented by counsel.  
20 See Eighth Judicial District Court Rule 7.42(b); *see also In re Discipline of*  
21 *Schaefer*, 117 Nev. 496, 508-09, 25 P.3d 191, 200 (2001); *Sunde v. Contel of*  
22 *Cal.*, 112 Nev. 541, 542-43, 915 P.2d 298, 299 (1996); *Salman v. Newell*, 110  
23 Nev. 1333, 1335, 885 P.2d 607, 608 (1994).  
24

WHEREFORE, The Chapter 7 Trustee requests the Court to formally dismiss the case.

/s/ Dotan Y. Melech  
DOTAN Y. MELECH,  
FEDERAL BANKRUPTCY TRUSTEE

**DECLARATION OF TRUSTEE**

I declare, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge, information and belief.

/s/ Dotan Y. Melech  
DOTAN Y. MELECH,  
FEDERAL BANKRUPTCY TRUSTEE